

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13 CASE NO.:**

**TIMOTHY WOOD and  
KIMBERLY WOOD**

**19-14516-JDW**

**LIMITED OBJECTION TO MOTION TO SELL PROPERTY**

COMES NOW Locke D. Barkley, Chapter 13 Trustee (the "Trustee"), by and through counsel, and files this Limited Objection to the Motion to Sell Property (Dkt. #43) (the "Motion") filed by the Debtors and in support thereof states as follows:

The Trustee has no objection to the sale of the Debtors' real property in the amount of \$318,000.00. However, the Trustee requests that within two (2) business days of the closing either counsel for the Debtors or the closing attorney be required to provide a copy of the HUD-1 Settlement Statement to the Trustee along with any sale proceeds in excess of the \$71,040.00 homestead exemption claimed by the Debtors pursuant to Schedule C (Dkt. #1, Pg. 17-18).

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Limited Objection be received and that this Court will enter its order granting the Motion subject to the limitations above and for such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: March 10, 2022.

Respectfully submitted,

**LOCKE D. BARKLEY**  
**CHAPTER 13 TRUSTEE**

By: /s/ Melanie T. Vardaman  
ATTORNEYS FOR TRUSTEE  
W. Jeffrey Collier (MSB 10645)  
Melanie T. Vardaman (MSB 100392)  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: March 10, 2022.

/s/ Melanie T. Vardaman  
MELANIE T. VARDAMAN